

Pursuant to MPEP §715.07 supporting documentary evidence as well as an eyewitness account by corroborating witness Harki Singh are provided to show reduction to practice prior to 6/20/2003. The supporting documentary evidence complying with MPEP §715.07 includes photocopies of: (C) photographs, (D) notebook entries, (F) statement by witness of audio/visual presentation, and (H) a witnessed invention disclosure document.

The declarations and supporting evidence clearly explain how the inventors demonstrated to the satisfaction of others skilled in the field that the inventors had recognized a problem (micromasking) and had reduced to actual practice a novel method of solving the problem (the "sputter etch" solution) and had timely submitted an invention disclosure to a law firm for preparation and filing of a corresponding patent application (namely, the subject application), all this occurring before the 6/20/2003 filing date of the Doshita reference. As such the inventors have demonstrated a sufficient basis for antedating the effective date of the Doshita reference.

CONCLUSION

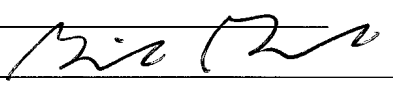
It is believed that all outstanding rejections are overcome by removal of the Doshita reference. Additionally it is submitted that attached Exhibit C demonstrates how difficult it is to determine the structure of micromasking residue because a chemical analysis alone does not indicate what is going on. Real world residue is contaminated with numerous compounds due to the complexity of plasma etching. The inventors had an a priori insight as to what was going on so that they could use the Exhibit C results to confirm their theories. Additionally, the successful experimental results (wafer number 22) confirmed their theories and constituted actual reduction to practice. Given that Doshita is removed, it is respectfully submitted that no rejection is outstanding and it is respectfully requested that allowable subject matter be again indicated as it was in earlier Office actions. Should any other action be

LAW OFFICES OF
MacPherson, Kwok, Chen &
Heid LLP

2033 Gateway Place
Suite 400
San Jose, CA 95110
Telephone: (408)-392-9520
Facsimile: (408)-392-9262

contemplated by the Examiner, it is respectfully requested that he contact the undersigned at (408) 392-9250 to discuss the application.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-2257 for any matter in connection with this response, including any fee for extension of time and/or fee for consideration of the submissions, which may be required.

<p align="center">CERTIFICATE OF EFS-WEB TRANSMISSION</p> <p>Certificate of Transmission: I hereby certify that this correspondence is being transmitted to the United States Patent and Trademark Office (USPTO) via the USPTO's EFS-Web electronic filing system on</p> <p align="center"><u>June 3, 2008</u> (Date).</p> <p>Typed or printed name of person signing this certificate:</p> <p><u>Gideon Gimlan</u></p> <p>Signature: <u></u></p>
--

Respectfully submitted,



Gideon Gimlan
Attorney for Applicants
Reg. No. 31,955

MacPherson Kwok Chen & Heid LLP
2033 Gateway Place, Suite # 400
San Jose, CA 95110
Tel: (408) 392-9250

LAW OFFICES OF
MacPherson, Kwok, Chen &
Heid LLP

2033 Gateway Place
Suite 400
San Jose, CA 95110
Telephone: (408)-392-9520
Facsimile: (408)-392-9262